

FILED

2018 JAN 10 PM 5: 36

CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

ELIZABETH A. STRANGE
First Assistant United States Attorney
District of Arizona
MICHAEL P. JETTE
Assistant U.S. Attorney
DAVID FLANNIGAN
Assistant U.S. Attorney
405 West Congress, Suite 4800
Tucson, Arizona 85701-5040
Telephone: (520) 620-7300
E-mail: michael.jette@usdoj.gov
E-mail: david.flannigan@usdoj.gov
Attorneys for Plaintiff

CR18- 78TUC RCC(LAB)

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States of America,
Plaintiff,

v.

1. Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES-Silvestre, aka Guillermo RAMIREZ, aka PRIMO
(Counts 1, 3, 6, 8, 9, 12, 13, 14, 15, and 18)
2. Diana Yazmin GARCIA-Morales
(Counts 1, 16, and 18)
3. Maria MENDOZA-Mendoza aka GUERA
(Counts 1, 9, 10, and 18)
4. Julio Humberto COTA-Leyva aka BETIN
(Counts 1 and 18)
5. Rolando COTA-Leyva aka CHAPO
(Count 1)
6. Sandro VELAZQUEZ-Diaz aka GUERO
(Counts 1, 2, 4, 5, and 18)
7. Susana HERNANDEZ-Castro
(Counts 1, 2, and 18)
8. Ernesto Santiago FRAUSTO-Carrillo aka NETO
(Counts 1, 6, and 8)
9. Chad FULLER
(Counts 1 and 7)
10. Erick HERNANDEZ
(Counts 1, 8, and 17)
11. Romeo GUOX-Az aka DAVID
(Counts 1, and 18)
12. Marcelina MENDOZA-Mendoza
(Counts 1 and 18)

INDICTMENT

VIOLATIONS:

8 U.S.C. § 1324(a)(1)(A)(v)(I)
(Conspiracy to Transport and Harbor Illegal Aliens for Profit)
(Count 1)

8 U.S.C. § 1324(a)(1)(A)(ii)
8 U.S.C. § 1324(a)(1)(B)(i)
(Transportation of an Illegal Alien for Profit)
(Counts 2,3,4,5,7,8,9,13,14)

8 U.S.C. § 1324(a)(1)(A)(iii)
8 U.S.C. § 1324(a)(1)(B)(i)
(Harboring Illegal Aliens for Profit)
(Counts 6,10,12)

18 U.S.C. § 1956(h)
(Conspiracy to Commit Money Laundering)
(Count 18)

8 U.S.C. § 1326 (enhanced by
8 U.S.C. § 1326(b)(1) and **(b)(2)**
(Illegal Reentry)
(Counts 15,16, and 17)

13. Oscar LOPEZ-Mendoza
(Counts 1 and 9)
14. Joel Antonio GARCIA-Martinez
(Count 1)
15. Josue Feliciano CARRILLO-Diaz aka PEPE
(Counts 1 and 14)
16. Jonathan Alexander PALMA-Giron aka
PATO (Counts 1, 9, and 14)
17. Miguel RUIZ-Lujan
(Counts 1, 10, and 11)
18. Magaly GARCIA-Leyva
(Counts 1, 10, and 11)
19. Diana REYES
(Counts 1 and 18)
20. Rogelio CEDILLO-Cruz
(Counts 1 and 18)
21. Radames LOPEZ-Macias
(Counts 1 and 18)
22. Manual David LOPEZ-Macias
(Counts 1 and 18)
23. Walter Raul REYES-Vasquez
(Counts 1 and 18)
24. Perla RIOS
(Counts 1 and 18)
25. Stephanie Guadalupe VALDEZ-Quevedo
(Counts 1 and 18)
26. Willy Said GAMEZ Orellana
(Counts 1 and 18)
27. Sergio MORA-Cruz
(Count 1)

Defendants.

**18 USC §§ 922(g)(5)(A) and
924(a)(2) (Possession of a Firearm
by an Illegal Alien)
(Count 11)**

FORFEITURE ALLEGATION

**18 USC §§982(a)(6)(A)(ii)(I),
982(a)(6), 982(a)(1), 981(a)(1)(C),
and 28 USC §2461(c)**

(UNDER SEAL)

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Transport and Harbor Illegal Aliens for Profit

From a date unknown to on or about January 9, 2018, in the District of Arizona and elsewhere, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES-Silvestre aka PRIMO; Diana Yazmin GARCIA-Morales; Maria MENDOZA-Mendoza aka

GUERA; Julio Humberto COTA-Leyva aka BETIN; Rolando COTA-Leyva aka CHAPO; Sandro VELAZQUEZ-Diaz aka GUERO; Susana HERNANDEZ-Castro; Ernesto Santiago FRAUSTO-Carrillo aka NETO; Chad FULLER, Erick HERNANDEZ; Romeo Lorenzo GUOX-Az aka DAVID; Marcelina MENDOZA-Mendoza; Oscar LOPEZ-Mendoza; Joel Antonio GARCIA-Martinez; Josue Feliciano CARRILLO-Diaz aka PEPE; Jonathan Alexander PALMA-Giron aka PATO; Miguel RUIZ-Lujan; Magaly GARCIA-Leyva; Diana REYES; Rogelio CEDILLO-Cruz; Radames LOPEZ-Macias; Manual David LOPEZ-Macias; Perla RIOS; Stephanie Guadalupe VALDEZ-Quevedo; Willy Said GAMEZ-Orellana; Walter Raul REYES-Vasquez; and Sergio MORA-Cruz did knowingly and intentionally combine, conspire, confederate, and agree together and with various other persons known and unknown to the Grand Jury, to transport and move illegal aliens, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and to conceal, harbor, and shield from detection said illegal aliens, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), all within the United States, and did so for the purpose of commercial advantage and private financial gain, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

COUNT 2

Transportation of an Illegal Alien for Profit

On or about August 29, 2016, at or near Sells and Wickieup, in the District of Arizona, Susana HERNANDEZ-Castro and Sandro VELAZQUEZ-Diaz aka GUERO did knowingly and in reckless disregard of the fact that aliens Jose LOPEZ-Mendoza, Bictor TELLO-Lopez, Alex ZELAYA-Castro, Elmer ZAVALA-Mendoza, and Angel ALVARADO-Cifuentes, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8,

United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 3

Transportation of an Illegal Alien for Profit

On or about September 12, 2016, at or near Sells and Phoenix, in the District of Arizona and elsewhere, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES Silvestre, aka Guillermo RAMIREZ, aka PRIMO did knowingly and in reckless disregard of the fact that aliens Gabriel REYES-Garcia, Clemente MARCIAL-Hernandez, Roberto HERNANDEZ-Alvarez, Andres ZEPEDA-Cholula, Arturo BENITEZ-Matias, Carmelo ENCARNACION-Santiago, Hilario MARCIANO-Garcia, Tereso GARCIA-Garcia, Hector FLORES-Merlo, Angel CANSECO-Rios, Sergio MARTIN-Chavez, and Darwin Lenin FUNEZ-Rodriguez had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 4

Transportation of an Illegal Alien for Profit

On or about October 8, 2016, at or near Sells and Phoenix, in the District of Arizona and elsewhere, Sandro VELAZQUEZ-Diaz aka GUERO did knowingly and in reckless disregard of the fact that aliens Luis SANCHEZ-Alas, Saul OCHOA-Ramos, Reynalda HERNANDEZ-Moranchel, Jose LOPEZ-Perez, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 5**Transportation of an Illegal Alien for Profit**

On or about March 15, 2017, at or near Sells and Arizona City, in the District of Arizona, Sandro VELAZQUEZ-Diaz aka GUERO, knowing and in reckless disregard of the fact that alien Leovardo LOPEZ-Solis had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 6**Harbor of an Illegal Alien for Profit**

On or about July 12 and 13, 2017, at or near Sells and Phoenix, in the District of Arizona, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES Silvestre, aka Guillermo RAMIREZ, aka PRIMO and Ernesto Santiago FRAUSTO-Carrillo aka NETO knowing and in reckless disregard of the fact that aliens Santos MARTIN-Ramos, David GARCIA-Moscoso, Jhonny Osorio, Francisco Elias Duarte-Hernandez, Ever Perez-Nolasco, Maximo Velasquez-Pablo, Valdomero Martin-Chavez, Juan Chajal-Rosales, Jose Ramos-Martin, Oscar Perez-Sicaja, Waider BARTOLIN-Bail, Victor Daniel Sebastian-Sandoval, Carlos Morales-Hernandez, Jason OCHOA-MAZARIEGOS, Wilder Alexander Lopez-Chilel, Simon Morales-Ramos, Byron Sirin-Maxia, Antonio Gonzalez, Juan ANTONIO-Matias, Adolfo Gomez-Perez, Carlos Rabanalez-Perez, Hugo Velasco-Hernandez, and Erick Tlaxcaltecatl-Rodriguez, had come to, entered and remained in the United States in violation of law, and concealed, harbored, and shielded from detection said illegal aliens, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), all within the United States, and did so for the purpose of commercial advantage and private financial gain, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

COUNT 7**Transportation of an Illegal Alien for Profit**

On or about August 17, 2017, at or near Sells and Eloy, in the District of Arizona, Chad FULLER, knowing and in reckless disregard of the fact that aliens Manuel MENDOZA-Mendoza, Santiago ALVA-Olivares, Jose MONZON-Sanchez, Celestino PEREZ-Vasquez, and Candido GUTIERREZ-Lopez had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 8**Transportation of an Illegal Alien for Profit**

On or about September 9 through September 12, 2017, at or near Sells and Phoenix in the District of Arizona and elsewhere, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES Silvestre, aka Guillermo RAMIREZ, aka PRIMO; Erick HERNANDEZ; and Ernesto Santiago FRAUSTO-Carrillo aka NETO, knowing and in reckless disregard of the fact that aliens Rony NIZ-Mendez, Celestino SANCHEZ-Amador, Alex Normandi ROBLERO-Perez, Roman GARCIA-Huesca, Alberto CRUZ-Lopez, Jaime MARTINEZ-Mejia, Jose RODRIGUEZ-Rosales, Magali PALACIOS-Torres, Jose LOPEZ-Martinez, Santos CORTEZ-Pena, Aroldo LOPEZ-Lopez, Keiler CRUZ-Esquivel, and Santos CATARINO-Juarez, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 9**Transportation of an Illegal Alien for Profit**

On or about October 19, 2017, at or near Sells and Phoenix, in the District of Arizona and elsewhere, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES-Silvestre, aka Guillermo RAMIREZ, aka PRIMO; Maria MENDOZA-Mendoza aka GUERA; Oscar LOPEZ-Mendoza; and Jonathan Alexander PALMA-Giron aka PATO, knowing and in reckless disregard of the fact that aliens Jose TRINIDAD-Soto, Saqueo TOMAS-Bartolon, Fausto VASQUEZ-Garcia, Jose ENRIQUEZ, Carlos LARREINAGA-Diaz, Yacson GOMEZ-Alonzo, Luis Alonso SANTOS-Dias, and Jose BEJARANO-Martinez had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 10**Harbor of an Illegal Alien for Profit**

On or about November 30 through December 1, 2017, at or near Sells and Phoenix, in the District of Arizona, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES Silvestre, aka Guillermo RAMIREZ, aka PRIMO, Maria MENDOZA-Mendoza aka GUERA, Magaly GARCIA-Leyva, and Miguel RUIZ-Lujan knowing and in reckless disregard of the fact that aliens Mercedes Gonzalez-Ramirez and Maricela Barrera-Barrera, had come to, entered and remained in the United States in violation of law, and concealed, harbored, and shielded from detection said illegal aliens, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), all within the United States, and did so for the purpose of commercial advantage and private financial gain, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

COUNT 11**Possession of a Firearm by an Illegal Alien**

On or about November 30 through December 1, 2017, at or near Sells and Phoenix, in the District of Arizona, Magaly GARCIA-Leyva and Miguel RUIZ-Lujan, aliens who was illegally and unlawfully in the United States, did knowingly possess a firearm, that is, Dickson Shotgun, Serial 163310143, said firearm not being manufactured in Arizona thus affecting commerce in that it previously was transported into the state of Arizona from another state or foreign country; in violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(2).

COUNT 12**Harbor of an Illegal Alien for Profit**

On or about December 4, 2017, at or near Sells and Phoenix, in the District of Arizona, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES Silvestre, aka Guillermo RAMIREZ, aka PRIMO and Walter Raul REYES-Vasquez knowing and in reckless disregard of the fact that aliens Brian Rivera-Hernandez and Samuel Ortiz-Cartagena, had come to, entered and remained in the United States in violation of law, and concealed, harbored, and shielded from detection said illegal aliens, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), all within the United States, and did so for the purpose of commercial advantage and private financial gain, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(iii), and 1324(a)(1)(B)(i).

COUNT 13**Transportation of an Illegal Alien for Profit**

On or about December 7, 2017, at or near Sells and Phoenix, in the District of Arizona and elsewhere, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES-Silvestre, aka PRIMO and Sandro VELAZQUEZ-Diaz aka GUERO, knowing and in reckless disregard of the fact that aliens Osbeli PEREZ-Perez, Pedro PEREIRA-

Mazariegos, Federico VAIL Sales, Maribel NIS-Lopez, Sandro VELAZQUEZ-Diaz, Oliver MORALES-Ines, Alonso SUNUN Rodriguez, Jocabed VELAZQUEZ-Rodriguez, Melvin CASTANEDA-Pereira, Jorge VERDUGO-de Leon, Juan SALES-Cuevos, and Juana SEBASTIAN-Morales, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 14

Transportation of an Illegal Alien for Profit

On or about December 15, 2017, at or near Sells and Phoenix, in the District of Arizona and elsewhere, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES-Silvestre, aka Guillermo RAMIREZ, aka PRIMO, Jonathan Alexander PALMA-Giron aka PATO, and Josue Feliciano CARRILLO-Diaz aka PEPE, knowing and in reckless disregard of the fact that aliens Victor Cruz-Hernandez, Elmer Mejia-Hernandez, Uriel Trevino-Mendoza, Dulce Hernandez-Gaspar, and Alssandro Gayo-Ruiz, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

COUNT 15

Illegal Reentry

On or about July 12, 2017, at or near Phoenix, in the District of Arizona, Audias SANCHEZ-Colin aka Jesus SOTO-Garay aka Roman MONTES-Silvestre, aka Guillermo RAMIREZ, aka PRIMO, an alien, entered and was found in the United States of America after having been denied admission, excluded, deported, and removed therefrom at or near

1 Arizona, on or about August 21, 2006, and not having obtained the express consent of the
2 Attorney General or the Secretary of the Department of Homeland Security to reapply for
3 admission thereto; in violation of Title 8, United States Code, Section 1326, enhanced by
4 Title 8, United States Code, Section 1326(b)(1) and (b)(2).

5 **COUNT 16**

6 **Illegal Reentry**

7 On or about January 4, 2018, at or near Phoenix, in the District of Arizona, Diana
8 Yazmin GARCIA-Morales, an alien, entered and was found in the United States of
9 America after having been denied admission, excluded, deported, and removed therefrom
10 at or near Arizona, on or about April 20, 2015 and not having obtained the express consent
11 of the Attorney General or the Secretary of the Department of Homeland Security to
12 reapply for admission thereto; in violation of Title 8, United States Code, Section 1326,
13 enhanced by Title 8, United States Code, Section 1326(b)(1) and (b)(2).

14 **COUNT 17**

15 **Illegal Reentry**

16 On or about November 22, 2017, at or near Phoenix, in the District of Arizona,
17 Erick HERNANDEZ, an alien, entered and was found in the United States of America after
18 having been denied admission, excluded, deported, and removed therefrom at or near
19 Virginia on or about May 29, 2012, and not having obtained the express consent of the
20 Attorney General or the Secretary of the Department of Homeland Security to reapply for
21 admission thereto; in violation of Title 8, United States Code, Section 1326, enhanced by
22 Title 8, United States Code, Section 1326(b)(1) and (b)(2).

23 **COUNT 18**

24 **Conspiracy to Commit Money Laundering**

25 From a date unknown and continuing through January 8, 2018, in the District of
26 Arizona and elsewhere, the defendants Audias SANCHEZ-Colin aka Jesus SOTO-Garay
27 aka Roman MONTES Silvestre, aka Guillermo RAMIREZ, aka PRIMO, Diana Yazmin
28

1 GARCIA-Morales, Maria MENDOZA-Mendoza aka GUERA, Julio Humberto COTA-
 2 Leyva aka BETIN, Sandro VELAZQUEZ-Diaz aka GUERO, Susana HERNANDEZ-
 3 Castro, Romeo GUOX-Az aka DAVID, Marcelina MENDOZA-Mendoza, Diana REYES,
 4 Rogelio CEDILLO-Cruz, Radames LOPEZ-Macias, Manual David LOPEZ-Macias,
 5 Manuel David LOPEZ-Macias, Perla RIOS, Stephanie Guadalupe VALDEZ-Quevedo,
 6 Willy Said GAMEZ-Orellana, and Walter Raul REYES-Vasquez did knowingly combine,
 7 conspire, and agree with each other and with other persons known and unknown to the
 8 Grand Jury to commit offenses against the United States in violation of Title 18, United
 9 States Code, Section 1956, to wit:

10
 11 Conducted and attempted to conduct financial transactions affecting
 12 interstate commerce, which transactions involved the proceeds of specified
 13 unlawful activity, that is, the transportation and movement of illegal aliens,
 14 in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and the
 15 concealment, harboring, and shielding of illegal aliens, in violation of Title
 16 8, United States Code, Section 1324(a)(1)(A)(iii),

17 All in violation of Title 18, United States Code, Section 1956(h).
 18

19 FORFEITURE ALLEGATION

20 Upon conviction of the violations alleged in Counts 1-18 of this Indictment,
 21 defendants, Audias Sanchez-Colin aka Jesus Soto-Garay aka Roman Montes Silvestre, aka
 22 Primo; Diana Yazmin Garcia-Morales; Maria Mendoza-Mendoza aka Guera; Julio
 23 Humberto Cota-Leyva aka Betin; Rolando Cota-Leyva aka Chapo; Sandro Velazquez-Diaz
 24 aka Guero; Susana Hernandez-Castro; Ernesto Santiago Frausto-Carrillo aka Neto; Chad
 25 Fuller; Erick Hernandez; Romeo Guox-Az, aka David; Marcelina Mendoza-Mendoza;
 26 Oscar Lopez-Mendoza; Joel Antonio Garcia-Martinez; Josue Feliciano Carrillo-Diaz aka
 27 Pepe; Jonathan Alexander Palma-Giron aka Pato; Miguel Ruiz-Lujan; Magaly Garcia-
 28

1 Leyva; Diana Reyes; Rogelio Cedillo-Cruz; Radames Lopez-Macias; Manual David
2 Lopez-Macias; Perla Rios; Stephanie Guadalupe Valdez-Quevedo; Willy Said Gamez
3 Orellana; Walter Raul Reyes-Vasquez; and Sergio Mora-Cruz, shall forfeit to the United
4 States pursuant to:

- 5 1) Title 18, United States Code, Section 982(a)(6)(A)(ii)(I), all right, title, and
6 interest in any property, real or personal, that constitutes, or is derived from
7 or is traceable to the proceeds obtained directly or indirectly from the
8 commission of an offense in violation of Title 8, United States Code, Section
9 1324;
- 10 2) Title 18, United States Code, Section 982(a)(6), any conveyance, including
11 any vessel, vehicle, or aircraft, used in the commission of the offense; any
12 property, real or personal, that constitutes or is derived from or is traceable to
13 the proceeds obtained directly or indirectly from the commission of the
14 offense, and any property, real or personal, used to facilitate or intended to be
15 used to facilitate the commission of the offense in violation of Title 8, United
16 States Code, Section 1324;
- 17 3) Title 18, United States Code, Section 982(a)(1), all right, title, and interest in
18 any property, real or personal, involved in an offense of Title 18, United
19 States Code, Section 1956, or any property traceable to such property, and
- 20 4) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United
21 States Code, Section 2461(c), all right, title, and interest in any property, real
22 or personal, which was involved in a transaction or attempted transaction of
23 Title 18, United States Code, Section 1956 and which constitutes or was
24 derived from the proceeds traceable to a violation of Title 8, United States
25 Code, Section 1324.

26 The property to be forfeited includes, but is not limited to:
27
28

- a) the real property known as and located at 372 NW Oakland Dr. Gainesville, Georgia, with Hall County Tax Assessor's Parcel Number 01089 001005;
- b) the real property known as, and located at, with a mailing address of 3211 Cleveland HWY, Gainesville, Georgia, with a legal description address of 3215 Cleveland Highway, Gainesville, Georgia, with Hall County Tax Assessor's Parcel Number 10139000096;
- c) the real property known as and located at 5608 Stephens Road, Oakwood, Georgia, with Hall County Tax Assessor's Parcel Number 08089A003002;
- d) the real property known as and located at 5276 Old Hickory Place, Gainesville, Georgia, with Hall County Tax Assessor's Parcel Number 11109A000024;
- e) the real property known as and located at 35032 W. McNeil St., Arlington, Arizona with Maricopa County Assessor's Parcel Number 40142073;
- f) 2010 Ford Expedition, VIN: 1FMJU1K56AEA76068, and
- g) A sum of money equal to the amount of proceeds obtained as a result of the offenses.

If any of the property described above, as a result of any act or omission of the defendants: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States to seek forfeiture of any other property of the defendants up to the value of the above-described forfeitable property, including but not limited to all property, both real and personal, owned by the defendants, pursuant to Title 21, United States Code, Section

1 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28,
2 United States Code, Section 2461(c).

3 All pursuant to Title 18, United States Code, Section 982(a)(6)(A)(ii)(I), Title 18,
4 United States Code, Section 982(a)(6), Title 18, United States Code, Section 982(a)(1),
5 Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code,
6 Section 2461(c), Title 21, United States Code, Section 853(p), Title 28, United States Code,
7 Section 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

8
9
10
11 **A TRUE BILL**

12
13 **/s/**

14 _____
Presiding Juror

15
16 ELIZABETH A. STRANGE
17 First Assistant United States Attorney
District of Arizona

18 **/s/**

19 _____
Assistant United States Attorney
20 Date:

21 **JAN 10 2018**

22
23 **REDACTED FOR**
24 **PUBLIC DISCLOSURE**
25
26
27
28